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IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF UTAH, CENTRAL DIVISION

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UTAH PHYSICIANS FOR A HEALTHY  
ENVIRONMENT, INC.,

Plaintiff,

v.

TAP WORLDWIDE, LLC (d/b/a 4 WHEEL  
DRIVE HARDWARE, TRANSAMERICAN  
AUTO PARTS, UNITED WEB SALES, 4  
WHEEL PARTS, 4 WHEEL PARTS  
PERFORMANCE CENTER, and  
TRANSAMERICAN WHOLESALE),

Defendant.

**JOINT MOTION FOR ENTRY OF  
CONSENT DECREE**

Case No. 2:19-cv-00628

District Judge David Barlow  
Magistrate Judge Dustin B. Pead

Plaintiff Utah Physicians for a Healthy Environment and Defendant TAP Worldwide LLC, hereby respectfully move for entry of the Consent Decree in this matter. Attachment A.

The Consent Decree was lodged with the court on March 10, 2023, and the forty-five (45) day review period provided to the United States Department of Justice and the Environmental Protection Agency by the Clean Air Act, has now ended. The Government's May 8, 2023 comments on the Consent Decree, Attachment B, raised no concern with its approval by the Court.

The Consent Decree resolves all claims in this case. Because the Decree represents a fair, reasonable, and equitable resolution of this matter, the Parties respectfully move for its entry. A proposed order is provided.

DATED: May 26, 2023

FOR UPHE

FOR TAP

s/ Reed Zars  
Reed Zars [Utah Bar No.16351]

s/ Erik A. Olson  
Erik A. Olson [Utah Bar No. 8479]

s/ Michelle Fein  
Michelle Fein [Utah Bar No. 18065]